

The Boeing Company  
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May 17, 2007  
E-1370-07-RR



Mr. Dan Duncan  
PCB Coordinator  
Environmental Protection Agency, Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Dear Mr. Duncan:

Subject: PCB Containing Bulk Product associated with 600,000 gallon  
above ground Jet A Fuel Tank at the Boeing Plant 2 Facility

This correspondence is submitted to document the understanding reached between Boeing and EPA that a project specific proposal will not be developed and submitted to EPA for the PCB issues identified in the containment area of the 600,000 gallon above ground Jet A Fuel Tank at the Boeing Plant 2 Facility. As we discussed on March 22, 2007, and, in lieu of two recent letters from the EPA RCRA Corrective Action Program (dated February 15 and April 11, 2007), Boeing feels it is premature and inappropriate to commit to a project specific course of action at this time.

The February 15 and April 11, 2007, EPA letters direct Boeing "to identify all PCB contaminated concrete caulk at the facility with concentrations of PCBs above 1 ppm", and, "develop a plan for the future removal of all caulk with concentrations of PCBs in excess of 50 ppm, per section 40 CFR 761.61 (a)(4)". Actions under consideration for the PCB issues identified at the Jet A Fuel Tank area will fall within the greater scope of work directed by the afore mentioned EPA letters. This reality circumvents the need for a project specific proposal for the PCB issues identified at the Jet A Tank area.

Work has begun to develop a sampling protocol for caulk at the facility and a plan for removal of any caulk found in excess of 50 ppm. These work products are being developed by the internal Boeing group responsible for the Plant 2 RCRA Corrective Action activities. Upon completion, any work products developed and submitted to the EPA RCRA Program in accordance with these letters will be copied to the EPA TSCA Program accordingly.

USEPA RCRA

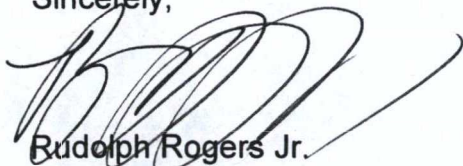


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As always, we appreciate your flexibility and cooperation. Should you have any questions regarding this correspondence, please don't hesitate to call.

Sincerely,



Rudolph Rogers Jr.  
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**BOEING**